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MEMORANDUM

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Arizona Corporation Commission

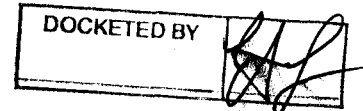
DOCKETED

FROM: Steven M. Olea
Director
Utilities DivisionCORP COMMISSION
DOCKET CONTROL

OCT 31 2014

DATE: October 31, 2014

ORIGINAL

RE: ARIZONA WATER COMPANY - REQUEST FOR EXTENSION OF COMPLIANCE
DEADLINE (DOCKET NO. W-01445A-07-0291)

In Decision No. 70379, dated June 13, 2008, the Arizona Corporation Commission ("Commission") approved the application of Arizona Water Company ("Arizona Water" or "Company") for an extension of its Certificate of Convenience and Necessity.

As part of Decision No. 70379, the Commission ordered that the Company provide the following within two years of the decision:

"a copy of the Arizona Department of Environmental Quality Certificate of **Approval to Construct** for facilities needed to serve Phase I within each of Parcels One, Two, Four and Five within two years of the effective date of this decision."

"a copy of the developer's **Certificate of Assured Water Supply** for each of Parcels One, Two, Four and Five within two years of the effective date of this decision."

Based on the Commission ordered two year timeframe, the original due date for compliance with these requirements was on or about June 13, 2010. In Decision No. 73777, the Commission subsequently approved a further extension of time on the Arizona Department of Environmental Quality ("ADEQ") Approval to Construct ("ATC") and Certificate of Assured Water Supply ("CAWS") for Parcels One, Two, Four and Five until June 13, 2014.

On April 11, 2014, Arizona Water docketed a new filing seeking an extension of time until June 13, 2016 for the provision of the remaining compliance items. The current application for extension of time included the required ATC filings for Parcels One, Two, Four and Five. It also included three of four request for service letters ("service letters") that were required by Staff. The ATC's and service letters were included in the filing as attachment number two and three, respectively. This left the CAWS filings for Parcels One, Two, Four and Five as the remaining item in this extension request.

On June 30, 2014, the Company supplemented the original application with the final service letter and thereby fulfilled the final requirement for processing of this amended application. The supplement did not seek to alter the original extension date of June 13, 2016 as proposed in the April 11, 2014 extension of time application.

Staff notes that the April 11, 2014 application for extension of time did not include all the ownership letters at the time of docketing. Additionally, the docket date was approximately two rather than three months before the pending June 13, 2014 due date. Staff therefore recommends that the Company be required to file requests for extension of time (if allowed to do so in the future) at least 90 days prior to the existing due date (in this or any other docket). Staff further recommends that the applications for extension of time (in this or any other docket) should include 100 percent of the ownership letters when originally filed.

Based on all of the above, Staff does not object to Arizona Water's request for further extension of time in this matter. Staff therefore recommends that the requirement for provision of the remaining CAWS for Parcels One, Two, Four and Five be extended until June 13, 2016.

SMO:BKB:tdp

Originator: Brian K. Bozzo

SERVICE LIST FOR: ARIZONA WATER COMPANY
DOCKET NO.: W-01445A-07-0291

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General Counsel
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